

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
	:	
IN THE MATTER OF THE APPLICATION OF	:	
ISABELLA HRANOV	:	
FOR AN ORDER TO TAKE DISCOVERY	:	Case No. 21-mc-751
PURSUANT TO 28 U.S.C. § 1782	:	
	:	
-----	X	

**DEUTSCHE BANK AG'S NOTICE OF MOTION  
TO QUASH SUBPOENA UNDER 28 U.S.C. § 1782**

PLEASE TAKE NOTICE that respondent Deutsche Bank AG, through its undersigned counsel, will move this Court, pursuant to 28 U.S.C. § 1782 and Fed. R. Civ. P. 60, for an Order quashing the Section 1782 discovery order previously entered by the Court on September 22, 2021 [Docket No. 8].

This motion is submitted based on this Notice of Motion, the accompanying Memorandum of Law, the accompanying Declaration of Dr. Jörg Mucke and Declaration of Dr. Christian Schmitt, the pleadings and documents on file in this case, and such other argument as may be presented by counsel at any hearing on this motion. The timing of this Motion shall be governed by Local Civil Rule 6.1(b).

Respectfully submitted,

Dated: October 29, 2021

**MORGAN, LEWIS & BOCKIUS LLP**

By: /s/ Joshua Dorchak  
Joshua Dorchak  
Melissa Y. Boey  
101 Park Avenue  
New York, New York 10178  
212.309.6700  
[joshua.dorchak@morganlewis.com](mailto:joshua.dorchak@morganlewis.com)  
[melissa.boey@morganlewis.com](mailto:melissa.boey@morganlewis.com)

*Attorneys for Respondent Deutsche Bank AG*